

REMARKS

The Examiner expresses the view that claims 1, 4-7, 9-19, and 23-30 are supposedly unpatentable over a five-way combination of US Pat. No. 5953199 to Owens, US Pat. No. 4071785 to Yoshida et al, and at least first and second assertions of things supposedly well known to one of ordinary skill in the art.

The first assertion of something supposedly well known to one of ordinary skill in the art is the claim that “the piezoelectric material are well known to one ordinary skill in the art as transducer or sensor for touch pad sensors” and that “so the electrodes formed on the piezoelectric films are sensing electrodes”. Applicant's attorney disagrees with this view, and motivated by the case of *In Re Ahlert and Kruger*, 165 USPQ 418 (CCPA 1970) applicant's attorney hereby challenges this view and asks whether the Examiner can show support for this view.

The second assertion of something supposedly well known to one of ordinary skill in the art is the claim that it is supposedly obvious to one ordinary skill in the art “to able to have a matrix touch panel with piezoelectric film having side operating electrodes forming interleaved column and row sensing electrode in the comb shaped with at least two finger in the reduction of the operating point or contact point and having ground electrode on the second layer protecting against electrically noisy environments.” Applicant's attorney disagrees with this view, and motivated by the case of *In Re Ahlert and Kruger*, 165 USPQ 418 (CCPA 1970) applicant's attorney hereby challenges this view and asks whether the Examiner can show support for this view.

The Examiner cites the interleaved fingers of Figure 8 of Yoshida as supposedly to be combined with teachings of Yoshida at Column 3 and elsewhere. But the interleaved fingers of Figure 8 are something that Yoshida says is prior art that one should not do. Thus the reference teaches away from such a combination.

Yoshida teaches the use of piezoelectric effects. This is quite different from and would not work with the capacitive type of sensing taught in Owens. One skilled in the art would not combine such incompatible technologies.

Reconsideration is requested for the independent claims for these reasons, and for the claims depending

therefrom.

Respectfully submitted,

/s/

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